Data Submitted (UTC 11): 4/10/2023 6:00:00 AM
First name: Victor
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Organization:
Title:
Comments: Wendy,

I did not hear back on the questions I sent in back on February 17th from the USFS.

So, in order to make the deadline, I have the following comments for Rob.

Please confirm that this was forwarded to Rob.

Comments of the F3 Newark Project

1. The first and foremost reason for this plan to be stopped is in this: Attachment #1

This should be the outcome of operations such as these when they not only affect the land but the people too. Many of the drill sites are just over 1,000 yds from homes. The effect is unknown in total. This is why many studies must be done to find out the effects with baseline established and monitored by independent sources.

2. Talking more with what is in their documents and general comments: Looking at the first iteration of the Plan of Operations dated August 11, 2020, it appears that the original period of the Newark Project would be 5 years. Now the Plan of Operations dated August 15th, 2022 shows 1 year. This along with other things I will note, make this document and their intent suspect at best. Working in the construction field most of my life and working on many projects with the Federal Government, a "Plan of Operations" such as this is misleading, vague, and self-serving. If I had presented this to say, the Army Corp, they would have thrown it in the trash. Every plan of operation had specifics for everything. This document should be thrown out and redone right!

3. The County has spoken, here is their word on this: Attachment #2.

4. With two dates, I believe their intent is to get started and then extend the dates to get the 5 years they wanted. This is just a selling point. Do not allow this.

5. They talk about regulations such as containment without a specific plan. What are they going to do exactly? Who will inspect for compliance and produce public reports to all, demand this!

6. They don't talk about noise at all. Their refrigerator example is an insult to everyone. This is not a plan; it is not giving what each piece of equipment will produce in Db. Demand this. See pic below for CDC and NIOSH info. This is the real noise.

7. On the noise topic. They have a list of equipment and the items they listed probably make more noise than the drill, all of them together is a HUGE amount of noise. They should give us a plan of Db for each 24 hours. An honest one.

8. The term "temporary access alignments" should read "new roads". This again is self-serving and just a

selling point. Clear, concise, and detailed information should be demanded.

9. They note compliance with "federal and state law", but not specific at all as to WHAT laws they are referring to and again, where is their specific plan on these issues?

10. Their plan shows year-round drilling so in the winter, the areas designated for wildlife that the public cannot enter with anything motorized, they suddenly can? This area should be off limits to ALL during the current closures. This will harm wildlife without a doubt.

11. Their plan calls for using Upper French Creek and Wabash 781 for main access. They make NO mention of maintaining these roads. They will be torn up and left for the county or the residents to deal with? They need an exact plan of how the roads will be repaired and maintained. Semi with Lowboys will bring equipment up those roads to a point, then they use the roads to their destination. Demand a plan.

12. They note they will minimize the use of roads traveled by the public. That is an outright lie. Their enumerated items that will use the road on Page 5 is ALL their equipment. Given their map they cannot avoid using the main roads a lot. This is why this location does not work for residents and infrastructure. Deny their plan.

13. Their plan calls for 39 drill sites. It does not specify how many holes are to be drilled and if there is a maximum.

14. Their plan, page 6 refers to using "available data sets" for determining state Historical preservation sites and then mention "cultural preservation sites". One is not the same and the second. They have done next to nothing to determine if any Native American sites or areas exist. Where did they get a chance to walk the area, to do their research? They did not get notification per their comments at the School Meeting. This must be deemed unacceptable and due diligence done.

15. They note that tree and brush removal will be done. What is their plan for where the removed items will go? Tossed down the hill or hidden out of sight? Demand more specifics and a solid enumerated plan.

16. Since most of our wells get water from natural drainage through rock, every hole they drill will become a well. 39 holes drilled will take about 51,000 gallons of groundwater. That amount reduces what our wells get and in a drought period, that spells disaster as wells run low or dry. This is one reason; this is the wrong place for this operation.

17. I see on page 6 that they note a buffer zone, 100' from known intermittent streams and water bodies "where possible". Are you kidding me? So, this says, at their discretion, they will do whatever the hell they want. What happens to water runoff from their drilling? Every small bit of water is what makes up French Creek. ANY interference will hurt the creek and everything downstream. This is too close to water sources and must have a better plan. A specific plan.

18. There is one line I do not understand. Page, C paragraph 2 they note that this is "an amendment to the plan of operations". So, is this the real plan of operations? They need to clarify this comment.

19. They refer to water that is sourced as Municipal or Industrial source. The one essential thing in the Black Hills that cannot be argued against is WATER. Every source must be used diligently. They have no SPECIFIC plan at all, no named source of water. This is not acceptable and you should demand the details first, not later. This arrangement with whatever source should be set forth up at the front end of the project.

20. Their list of equipment is lacking. Where are the Generators, storage facilities and other support equipment? There are no specifics on make, model and Db rating at full operation. I would expect Full Disclosure, you should

demand it.

21. Page 8, E refers to Porta-Potties. How are these to get serviced? Are we now having another piece of equipment on the roads and how do they get serviced in winter? Much more information needed.

22. Page 8, Air Quality. There is no monitoring noted and just a general reference to some kind of regulations. Specifics and a Plan is what is needed. They need to have independent regular monitoring.

23. On page 2 of their first application, they mention burying the tailings at the drill site. On the current plan, they state there will be NO tailing dumping on Page 9. You should not believe this at all and request a complete clarification on this.

24. I could go on for days about how bad this "Plan of Operation" is. It reads like a plan that maximizes the Corp decisions based on profit. They are vague in all areas and in some, misleading to outright deception with intent. This "Plan" should be thrown away and started over with real information, a time for public comments and revisions. Why not work with the people who WILL be impacted to create a balance?

25. A CE for a site a long way away is not going to work. A plan for one place is not the same as another. Here they are 1,000 ft from Homeowners property. A CE is not sufficient to see all the things they have left out, been vague and not provided sufficient information to make it clear what the ground rules are. THERE NEEDS TO BE an EIS!!! Demand this be done, think of your neighbors, town along with their needs.

26. I think the area for mining needs to be treated like real-estate. Location, Location, Location. That is the mantra of real estate value. In the case of mining, that mantra has EVERYTHING to do with the people who live next to it, near it and those in the area that will be impacted by it. For this reason alone, the mining act needs to be modified. In the meantime, you need to do all you can, start with an EIS! Find out the exact impact on EVERYTHING around even the prospecting, let alone the mining to come afterward. The people near it must be taken into consideration, otherwise you are just a tool for the corporations outside our state to take what they want.

In conclusion, there needs to be a change (and it appears that is on the way) for the separation of an owner miner and a corporation mining operation with the Dept of the Interior. The owner miner, with a pan, sluice box only muddies up the water, the corporation damages forever.

Sincerely

Victor Bausell

redacted

Thanks

Vic Bausell

redacted